




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7


11201 Renner Boulevard  
Lenexa, Kansas 66219


MAY 24 2017

**MEMORANDUM**

**SUBJECT:** Referral to Superfund for Drum Removal and Lead Soil Removal or Capping  
R.V. Hopkins, Inc.  
743 Schmidt Road, Davenport, Iowa 52802  
RCRA ID No. IAD022096028

**FROM:** Mike Dandurand, Project Manager   
Waste Remediation and Permitting Branch  
Air and Waste Management Division

**THRU:** Don Lininger, Chief   
Waste Remediation and Permitting Branch  
Air and Waste Management Division

**TO:** Adam Ruiz, Chief   
Superfund Division  
Response and Removal South Section

RCRA



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The U.S. Environmental Protection Agency Region 7 RCRA Waste Remediation and Permitting Branch is referring the former R.V. Hopkins, Inc., Davenport, Iowa facility to the Superfund Division for the purpose of conducting an assessment of a potential drum removal and lead soil removal or capping project. Several drums containing hazardous wastes were generated and abandoned at this facility. There is also an area of lead contaminated soil at the facility. WRAP contractors have conducted field screening of the contents of the drums and have characterized the soil contamination in the area of concern. The results of this screening and characterization are presented in the report that is included as Attachment II

Please find the following attachments:

- Attachment I - Facility Referral Documentation, RCRA to Non-RCRA Federal Authority
- Attachment II - Soil, Groundwater and Drum Sampling Event Report documenting activities and results from 2014 site investigations.

Please return a copy of Attachment I with all signatures to Mike Dandurand as this copy will be included in the RCRA files for this facility.

Please contact Mike Dandurand at 7504 or Jim Stevens at 7322 if you have any questions regarding this memorandum and attachments.

Attachments



Printed on Recycled Paper

Attachment I  
Referral Documentation  
RCRA to Non-RCRA Federal Authority

The R.V. Hopkins, Inc. facility, RCRA ID No. IAD022096028, is located at 743 Schmidt Road, Davenport, Iowa 52802. Per a May 09, 2017, meeting, the Waste Remediation and Permitting Branch is referring the facility to the Superfund Division. WRAP and SUPR have met and have determined that, since WRAP lacks the authorities and resources to respond further to this contamination, SUPR will assess the facility for possible response by SUPR utilizing authorities available under the Comprehensive Environmental Response, Compensation and Liability Act.

**Background:** The R.V. Hopkins Inc., facility in Davenport, Iowa is located in an industrial area of Davenport, Iowa. Railroad tracks are located to the north and west of the facility. U.S. Highway 61 and the Mississippi River are located to the south and east. Nestle Purina is to the north, and Midwest Metals, Inc. and Harco Chemicals, Inc. are to the east. Alter Metal Recycling and Midwest Exhibits are west of the facility, Jack's Brake Alignment and Service is south of the facility, and the Mississippi River is located approximately 0.25 mile southeast of the facility.

The facility is sited on a former quarry that was 40 to 60 feet deep. This quarry was used as a land disposal unit (landfill) for construction and demolition debris and foundry waste from 1935 to 1975. The former quarry and land disposal unit were in the northeastern third of the facility, now mostly covered by the concrete cap and parking lot. Depth to bedrock generally ranges from 6 to 17 feet, with the former quarry forming a local bedrock depression. Groundwater at the facility is typically found 3.5 to 8 feet below ground surface, flowing through an unconsolidated, unconfined, alluvial aquifer. The uppermost layers of the bedrock, which are fractured, also transmit groundwater. All historical site monitoring wells have been abandoned.

A variety of wastes were disposed of in the landfill, including construction and industrial waste. Before the purchase of the facility by RVH, the property had been used by a battery company that cracked lead-acid batteries. RVH began drum reclamation operations at a location across Schmidt Road in 1951 and purchased the 743 Schmidt Road property in 1964. RVH filled the landfill with foundry sand, and resumed drum reclamation activities at the 743 Schmidt Road location. The current owner of the facility leases the property for storage and moving/rental vehicle purposes.

Over the years, the EPA has conducted numerous RCRA Compliance Evaluation Inspections of the facility and has cited RVH numerous times for violations. The EPA has taken various administrative enforcement actions against RVH seeking compliance with RCRA including: An Administrative Consent Agreement and Consent Order in 1983, an Administrative Consent Agreement and Consent Order and the imposition of a fine in 1987, a Unilateral Administrative Order issued in 1994, and a Unilateral Administrative Order issued in 1997.

On January 11, 1999, the United States on behalf of the EPA, filed a complaint in the U.S. District Court for the Southern District of Iowa, Davenport Division (Civil No. 3-99-CV-60005), seeking injunctive relief against RVH pursuant to Sections 3008 and 7003 for violations of RCRA. This action was resolved by court orders dated July 7, 2000, and November 3, 2000. The November 3, 2000, court order, entitled "Findings of Fact, Conclusions of Law and Judgment Entry" found that RVH failed or substantially failed to comply with the earlier orders. As a result of the November 3<sup>rd</sup> court order, a revised closure plan was required to be submitted by RVH to the EPA and implemented upon the EPA's approval. RVH submitted a closure plan to the EPA in 2000, and a corrective action work plan to the EPA in 2001. While some closure activities outlined by the closure plan were conducted from 2001 to 2005, closure/corrective action were not

completed and drums contained hazardous waste remain on site as well as un-addressed surface soil contaminated with lead.

RVH had severe financial difficulties throughout its operations and in 2003 it was reported that RVH had not paid real estate taxes on the facility since 1981 and owed Scott County over \$900,000 in back taxes. The principals of RVH are now believed to be dead. One of RVH's principals, Harold Abdo, who managed the facility, was indicted for hazardous wastes violations and entered into a plea agreement with the United States whereby he paid a fine and served three years' probation. The Iowa Secretary of State's Office shows that RVH is no longer an active corporation. While RVH is no longer a viable entity, the November 3<sup>rd</sup> court order required RVH to establish financial assurance to ensure that the closure activities were completed. Financial assurance was established through a letter of credit. CNSL has been in contact with the bank that issued this letter of credit and it appears that the letter of credit is available to finance the work, or reimburse the EPA for conducting the work.

The Toeroek Associates, Inc. (Toeroek) Team received Task Order No. 015 from the EPA, under Contract No. EP-W-13-002, to provide assistance to RCRA state and federal program staff in Region 7. Specifically, WRAP requested that the Toeroek Team, which includes Toeroek Team Subcontractor Tetra Tech, Inc. (Tetra Tech), conduct a groundwater, soil, and unknown waste container field sampling investigation at the facility. From January 27 to 31, 2014, the Toeroek Team conducted investigations at the facility to obtain adequate data to allow the EPA to determine facility closure elements required to protect human health and the environment.

Surface soil samples were collected and analyzed for TCLP and total lead as specified in the SAP/QAPP. Reported lead concentrations in three of nine surface soil samples (SS-1, 5, and 6) exceeded the EPA Regional Screening Levels for residential soil (400 milligrams per kilogram [mg/kg]) and industrial soil (800 mg/kg), while an additional three samples (SS-4, 8, 9) exceeded the EPA RSL for residential soil only. No surface soil samples analyzed for lead via Toxicity Characteristic Leaching Procedure contained lead at a concentration above the EPA regulatory level of 5 milligrams per liter (mg/L).

Field screening of waste material (solids, liquids, sludges, paint waste, etc.) was conducted as specified in the SAP/QAPP. Waste material is generally present in 55 gallon drums. Field screening was used to determine if the waste material is water reactive, a corrosive oxidizer, ignitable, explosive, corrosive, cyanide, sulfide, or chlorinated. Reconnaissance identified 249 on-site containers (drums, totes, buckets, etc.) with unknown waste contents. Results from testing 52 field screening samples indicated that: 32 samples were identified as combustible, three samples were identified as flammable, five samples were identified as corrosive, one sample was identified as a corrosive oxidizer, and one sample was identified as a halide. The remaining 10 samples did not exhibit any hazardous characteristics.

**Contaminants of Concern:** As discussed above, abandoned drums exhibited combustible, flammable, corrosive, corrosive oxidizer and halide characteristics. Site soils contain levels of lead in exceedance of the EPA's RSL of 800 mg/kg for industrial soil.

**Contact Information for the former RV Hopkins, Inc. site:**

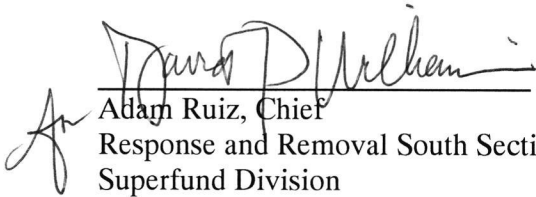
Parcel 1 – Drum Removal  
Mr. Mike Schumacher  
743 Schmidt Road, Davenport, Iowa 52802  
qcmets19@yahoo.com  
Cell: (563) 499-4188

Parcel 2 – Lead Contaminated Soils  
Mr. Donald Gardner  
Town and Country Moving and Storage  
13645 110<sup>th</sup> Avenue, Davenport, Iowa 52804



Don Lininger, Chief  
Waste Remediation and Permitting  
Air and Waste Management Division

May 23, 2017



Adam Ruiz, Chief  
Response and Removal South Section  
Superfund Division

May 24, 2017

Attachment II

RCRA File Document

Soil, Groundwater and Drum Sampling Event Report documenting activities and results from 2014 site investigations.